

**SUPERIOR COURT OF N.J.  
FILED**

**JUN 14 2006**

**DONALD F. PHELAN  
CLERK**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ523-06-17

Superior Court

Docket Number 06-06-00069-S

STATE OF NEW JERSEY

v.

NEW AFRICA DAY CARE CENTER, INC.

MUSLIMAH SULUKI

MAHDI SULUKI

and

ROBERT PARRISH

)

)

)

)

)

)

)

INDICTMENT

The Grand Jurors of and for the State of New Jersey, upon  
their oaths, present that:

COUNT ONE

(Theft by Failure to Make Required Disposition - Second Degree)

NEW AFRICA DAY CARE CENTER, INC.

MUSLIMAH SULUKI

MAHDI SULUKI

and

ROBERT PARRISH

between on or about January 1, 2001, and on or about March 4,  
2004, at the City of Newark, in the County of Essex, and at the  
City of Trenton, in the County of Mercer, elsewhere, and within  
the jurisdiction of this Court, did commit theft by purposely  
obtaining or retaining property belonging to the State of New  
Jersey, that is, public funding intended for the operation of the  
New Africa Day Care Center, having an approximate value in excess

of \$75,000, upon agreement or subject to a known legal obligation to make specified payment or other disposition and did deal with said public funding as their own and did fail to make the required payment or disposition, contrary to the provisions of N.J.S.A. 2C:20-9, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Misconduct by Corporate Officials - Second Degree)

MUSLIMAH SULUKI

MAHDI SULUKI

and

ROBERT PARRISH

between on or about January 1, 2001, and on or about March 4, 2004, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely or knowingly did use, control or operate a corporation for the furtherance or promotion of a criminal object, thereby deriving a benefit in an amount in excess of \$75,000, that is, the said MUSLIMAH SULUKI, Executive Director, MAHDI SULUKI, Corporate Board Member, and ROBERT PARRISH, Manager, New Africa Day Care Center, Inc., a corporation of the State of New Jersey, did use, control or operate New Africa Day Care Center, Inc., for the furtherance or promotion of the criminal objects of theft by failure to make required disposition of property received, in violation of N.J.S.A. 2C:20-9 and theft by deception, in violation of N.J.S.A. 2C:20-4a, N.J.S.A. 2C:20-2, contrary to the provisions of N.J.S.A. 2C:21-9c, N.J.S.A. 2C:21-8.1(b), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft by Deception - Third Degree)

MAHDI SULUKI

on or about March 30, 2004, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, purposely did obtain the property of Solid Waste Transfer and Recycling, having a value in excess of \$500, by deception, that is, the said MAHDI SULUKI did purposely obtain in excess of \$500 from Solid Waste Transfer and Recycling by creating or reinforcing the false impression that he was soliciting donations for New Africa Day Care Center,

WHEREAS, IN TRUTH AND IN FACT, as the said MAHDI SULUKI, well knew, he was not soliciting donations for New Africa Day Care Center because New Africa Day Care Center had closed on March 4, 2004, contrary to the provisions of N.J.S.A. 2C:20-4a and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Failure to File a New Jersey Income  
Tax Return - Third Degree)

MUSLIMAH SULUKI

on or about April 15, 2002, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a New Jersey Income Tax - Resident Return required to be filed pursuant to N.J.S.A. 54A:8-3.1, with the intent to defraud, evade, avoid or otherwise not make timely payment of New Jersey Income Tax required to be paid pursuant to N.J.S.A. 54A:8-1; that is, the said MUSLIMAH SULUKI did fail to file New Jersey Income Tax - Resident Return for the 2001 calendar year, with the intent to evade, avoid or otherwise not make timely payment of the New Jersey individual income tax, said return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-3.1, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Failure to File a New Jersey Income  
Tax Return - Third Degree)

MUSLIMAH F. SULUKI

on or about April 15, 2003, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a New Jersey Income Tax - Resident Return required to be filed pursuant to N.J.S.A. 54A:8-3.1, with the intent to defraud, evade, avoid or otherwise not make timely payment of New Jersey Income Tax required to be paid pursuant to N.J.S.A. 54A:8-1; that is, the said MUSLIMAH SULUKI did fail to file New Jersey Income Tax - Resident Return for the 2002 calendar year, with the intent to evade, avoid or otherwise not make timely payment of the New Jersey individual income tax, said return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-3.1, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Failure to File a New Jersey Income  
Tax Return - Third Degree)

MUSLIMAH F. SULUKI

on or about April 15, 2004, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a New Jersey Income Tax - Resident Return required to be filed pursuant to N.J.S.A. 54A:8-3.1, with the intent to defraud, evade, avoid or otherwise not make timely payment of New Jersey Income Tax required to be paid pursuant to N.J.S.A. 54A:8-1; that is, the said MUSLIMAH SULUKI did fail to file New Jersey Income Tax - Resident Return for the 2003 calendar year, with the intent to evade, avoid or otherwise not make timely payment of the New Jersey individual income tax, said return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-3.1, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Failure to File a New Jersey Income  
Tax Return - Third Degree)

ROBERT PARRISH

on or about April 15, 2003, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a New Jersey Income Tax - Resident Return required to be filed pursuant to N.J.S.A. 54A:8-3.1, with the intent to defraud, evade, avoid or otherwise not make timely payment of New Jersey Income Tax required to be paid pursuant to N.J.S.A. 54A:8-1; that is, the said ROBERT PARRISH did fail to file New Jersey Income Tax - Resident Return for the 2002 calendar year, with the intent to evade, avoid or otherwise not make timely payment of the New Jersey individual income tax, said return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-3.1, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.



COUNT EIGHT

(Failure to File a New Jersey Income  
Tax Return - Third Degree)

ROBERT PARRISH

on or about April 15, 2004, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a New Jersey Income Tax - Resident Return required to be filed pursuant to N.J.S.A. 54A:8-3.1, with the intent to defraud, evade, avoid or otherwise not make timely payment of New Jersey Income Tax required to be paid pursuant to N.J.S.A. 54A:8-1; that is, the said ROBERT PARRISH did fail to file New Jersey Income Tax - Resident Return for the 2003 calendar year, with the intent to evade, avoid or otherwise not make timely payment of the New Jersey individual income tax, said return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-3.1, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.


COUNT NINE

(Failure to File a New Jersey Income  
Tax Return - Third Degree)

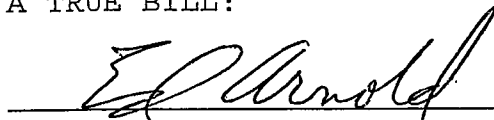
MAHDI SULUKI

on or about April 15, 2004, at the City of Newark, in the County of Essex, and at the City of Trenton, in the County of Mercer, elsewhere, and within the jurisdiction of this Court, did fail to file a New Jersey Income Tax - Resident Return required to be filed pursuant to N.J.S.A. 54A:8-3.1, with the intent to defraud, evade, avoid or otherwise not make timely payment of New Jersey Income Tax required to be paid pursuant to N.J.S.A. 54A:8-1; that is, the said ROBERT PARRISH did fail to file New Jersey Income Tax - Resident Return for the 2003 calendar year, with the intent to evade, avoid or otherwise not make timely payment of the New Jersey individual income tax, said return required to be filed pursuant to the provisions of N.J.S.A. 54A:8-3.1, contrary to the provisions of N.J.S.A. 54:52-8, and against the peace of this State, the government and dignity of the same.

GREGORY A. PAW, DIRECTOR

  
Jennifer L. Gottschalk, S.D.A.G.  
Division of Criminal Justice

A TRUE BILL:

  
\_\_\_\_\_, Foreperson

Dated: 6/14/06

**SUPERIOR COURT OF N.J.  
FILED**

**JUN 14 2006**

**DONALD F. PHELAN  
CLERK**

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ523-06-17

Superior Court

Docket Number 06 - 06 - 0 0069 AS

STATE OF NEW JERSEY )

v. )

NEW AFRICA DAY CARE CENTER, INC. )

MUSLIMAH SULUKI )

ORDER OF VENUE

MAHDI SULUKI )

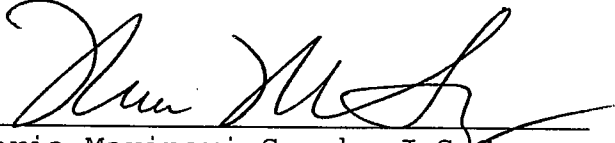
and )

ROBERT PARRISH )

An Indictment having been returned to this Court by the  
State Grand Jury in the above captioned matter,

IT IS ORDERED on this 14<sup>th</sup> day of June, 2006,  
pursuant to paragraph 8 of the State Grand Jury Act, that the  
County of Mercer be and hereby is designated as the County of venue  
for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court  
shall transmit forthwith the Indictment in this matter and a  
certified copy of this Order to the Criminal Division Manager of  
the County of Mercer for filing.

  
\_\_\_\_\_  
Maria Marinari Sypek, J.S.C.